



February 2, 2006

Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060 & EB-06-36, Certification of CPNI Filing 2005**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2005", as ordered in EB-06-TC-060 and EB-06-36.

Alpine Communications has established operating procedures that are adequate to ensure its compliance with the rules in Title 47 – Telecommunications, Section 64.2009. Furthermore I am certifying that I have personal knowledge of these procedures and they are in fact ensuring that our Company is in compliance with the rules in Title 47 – Telecommunications, Section 64.2009.

If you have any questions, please feel free to contact me.

Sincerely,

Kevin Hranicka  
Alpine Communications

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,  
Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington,  
DC 20554

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Room CY-B402,  
Washington, DC 20554

## **ANNUAL STATEMENT OF FCC CPNI RULE COMPLIANCE**

This statement serves to explain how Alpine Communications, an ILEC operating in Iowa and its affiliate Alpine Long Distance, (collectively “the Company” or “Company”) are complying with Federal Communications Commission (“FCC”) rules related to the privacy of customer information. The type of information for which customer privacy is protected by the FCC’s rules is called “customer proprietary network information” (“CPNI”). The FCC’s rules restricting telecommunication company use of CPNI are contained at Part 64, Subpart U of the FCC’s rules (47 C.F.R. §§ 64.2000-2009).

### **1. Identification of CPNI**

The Company has established procedures and trained employees having access to, or occasion to use customer data, to identify what customer information is CPNI consistent with the definition of CPNI under the FCC’s rules at Part 64, Subpart U, Section 64.2003(d) and Section 222(f)(1) of the Communications Act of 1934 as amended (47 U.S.C. § 222(f)(1)).

### **2. Identification of Services Affected by CPNI Rules**

The Company has established procedures and trained employees to recognize the different types of telecommunications and non-telecommunications services that affect how the Company uses CPNI.

### **3. Identification of Permissible Uses of CPNI without Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI not requiring customer authorization under the FCC’s Part 64, Subpart U, Section 64.2005.

### **4. Identification of Uses of CPNI Requiring Customer Authorization**

The Company has established procedures and trained employees having access to, or occasion to use CPNI, to identify uses of CPNI requiring customer authorization under the FCC’s rules at Part 64, Subpart U, Section 64.2007.

## STATEMENT OF CPNI RULE COMPLIANCE

### **5. Customer Notification and Authorization Process**

The Company has established procedures, and trained employees responsible for obtaining customer authorization to use CPNI for marketing purposes, regarding the notice and approval requirements under the FCC's Part 64, Subpart U CPNI rules. FCC's CPNI rules at Part 64, Subpart U, Section 64.2008. The Company has complied with the notice requirements for Opt-Out approval. The Company does not provide CPNI to other parties and thus has not used the opt-in approval process.

### **6. Record of Customer CPNI Approval/Non-Approval**

The Company has developed and utilizes a system for maintaining readily accessible record of whether and how a customer has responded to Opt-Out approval as required by Section 64.2009(a) of the FCC's Part 64, Subpart U CPNI rules.

### **7. Disciplinary Process**

The Company has in place an express disciplinary process to address any unauthorized use of CPNI where the circumstances indicate authorization is required under the FCC's Part 64, Subpart U CPNI rules.

### **8. Supervisory Review Process for Outbound Marketing**

The Company has established a supervisory review process regarding its compliance with the rules in Part 64, Subpart U, for outbound marketing situations. Prior to any outbound marketing effort, sales personnel must obtain supervisory approval of the proposed outbound marketing use. Any approval of CPNI use for outbound marketing efforts is limited to CPNI not requiring prior customer authorization or, where prior customer authorization is required, CPNI of customers having given the Company prior approval. The Company maintains records of its compliance for a minimum of one year.